

JAP:NR

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M 12- 210**

- - - - - X

UNITED STATES OF AMERICA

PRE-ARRAIGNMENT  
C O M P L A I N T  
(21 U.S.C. §§ 952(A)  
and 960)

- against -

LUIS CORADO, JR.,

Defendant. *federal defenders' appointed.*

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

REBECCA SHEA, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI").

Upon information and belief, on or about February 28, 2012, within the Eastern District of New York and elsewhere, defendant LUIS CORADO, JR. did knowingly, intentionally, and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

---

<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On February 28, 2012, defendant LUIS CORADO, JR. arrived at John F. Kennedy International Airport in Queens, New York ("JFK"), aboard Jet Blue Flight No. 826 from Santo Domingo, Dominican Republic.

2. The defendant LUIS CORADO, JR. was selected for a customs enforcement examination by Customs and Border Protection ("CBP"). In response to routine questions, defendant LUIS CORADO, JR. indicated that he was unemployed and was receiving unemployment benefits. He stated that he had purchased a round trip ticket to the Dominican Republic, but had missed his scheduled return on February 24, 2012. He also stated that he had purchased a one-way ticket to return on February 27, 2012, but had also missed that flight. He indicated that his family in New York was unaware that he was returning and that he intended to take a taxi home to the Bronx, although he had no money in his possession.

4. Defendant LUIS CORADO, JR. was subject to a pat down search, which was negative.

5. After further questioning, CBP staff requested and received approval for x-ray examination. The defendant was presented with an x-ray consent form which he appeared to read and understand and which he subsequently signed.

6. The defendant was transported to the medical facility at JFK where an x-ray was taken of the defendant's

intestinal tract, which was positive for foreign bodies.

Subsequently, the defendant passed twenty-five (25) pellets, one of which field-tested positive for the presence of heroin.

7. As of February 29, 2012 at 10:00 a.m., the defendant had passed approximately eighty one pellets (81) pellets in total.

8. Defendant LUIS CORADO, JR. will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that  
defendant LUIS CORADO, JR. be dealt with according to law.



REBECCA SHEA  
Special Agent  
Homeland Security Investigations

Sworn to me before this  
29th day of February, 2012

/\_\_\_\_\_  
HONORABLE ROANNE L. MANN  
EASTERN DISTRICT OF NEW YORK